

To: Hengst, Benjamin[Hengst.Benjamin@epa.gov]; Birgfeld, Erin[Birgfeld.Erin@epa.gov]
Cc: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]; Machiele, Paul[machiele.paul@epa.gov]; Burkholder, Dallas[burkholder.dallas@epa.gov]; Korotney, David[korotney.david@epa.gov]; Le, Madison[Le.Madison@epa.gov]; Charmley, William[charmley.william@epa.gov]; Simon, Karl[Simon.Karl@epa.gov]; Manners, Mary[manners.mary@epa.gov]; Weihrauch, John[Weihrauch.John@epa.gov]; Lie, Sharyn[Lie.Sharyn@epa.gov]
From: Bunker, Byron
Sent: Tue 5/12/2015 3:56:34 PM
Subject: News Story - Cellulosic Credits & Quad County

Cellulosic refiners hamstrung by chaos in RFS-credit market

Amanda Peterka, E&E reporter

Published: Monday, May 11, 2015

Quad County Corn Processors produced the Midwest's first gallons of cellulosic ethanol last summer with new technology added to a corn-ethanol plant in western Iowa.

And the company reached a milestone last month by producing its millionth gallon of the advanced biofuel.

But all is not well for Quad County.

Refiners aren't buying cellulosic fuel credits through the renewable fuel standard program for what the company produces. And so Quad County has received as much as \$600,000 less than expected for its wares -- a shortfall that's hurt the company's bottom line and affected its negotiations with other ethanol companies over licensing the technology.

"We can't tell people who license the technology if this is worth zero or this is really worth the proper value," CEO Delayne Johnson said Friday.

The difficulty of selling high-value credits under the renewable fuel standard (RFS) program is emerging as a key issue for the nation's first producers of cellulosic biofuels, or fuels made of non-food crops.

Renewable identification numbers, or RINs, are 38-digit numbers that are attached to gallons of biofuel. Under the RFS program, which Congress passed in 2007, refiners are obligated to use the credits to demonstrate compliance with annual biofuel mandates.

Cellulosic RINs represent gallons of ethanol that have smaller emissions of heat-trapping greenhouse gases than conventional corn ethanol.

"This is really a small issue within the broad scope of all the debates of the RFS, but it's actually, I think, quite an important issue," said James Stock, a professor of political economy at Harvard University and a former member of President Obama's Council of Economic Advisers. "It's not where all the political attention is, but it's really an important piece of the puzzle."

Quad County was formed in 2000 as a small conventional ethanol plant that converted corn into fuel. Eight years later, it opened a research and development facility to explore the production of advanced biofuel.

After several years, the company developed technology that would convert leftover fiber in the corn kernel into ethanol, a process that would generate an additional revenue stream and help meet the goals of the renewable fuel standard.

Quad County built the \$9 million "bolt-on" technology at its 35-million-gallon conventional ethanol plant with grants from the federal Departments of Agriculture and Energy, as well as the state of Iowa. The technology allows Quad County to increase its ethanol capacity by about 6 percent (*Greenwire*, July 2, 2014).

"For existing ethanol dry grain facilities, this is a natural progression," Johnson said in an interview early this year. "It's getting more out of the same feedstock that they already have. It makes the operation more efficient. I feel that this technology is easy to adopt relative to starting out with a whole new feedstock."

In April, Iowa Gov. Terry Branstad (R) visited the plant to celebrate the production of 1 million gallons of cellulosic ethanol. Since the announcement, Johnson estimates that the plant has produced an additional 150,000 gallons of the advanced biofuel.

But out of the total production, Quad County has been able to sell 80,000 cellulosic renewable fuel credits, Johnson said.

"A very small percentage of our total production has been able to be sold at this point," Johnson said.

Instead of selling cellulosic RINs to refiners, the company has instead been forced to detach the credits from the fuel and sell the cellulosic ethanol along with corn ethanol RINs of lower value. That has meant less money in Quad County's pocket.

"We need to be able to sell [cellulosic biofuel RINs] for the value that was intended under the market of the renewable fuel standard to continue to incentivize plants like us to be innovative," Johnson said, "and come up with ways to process cellulosic ethanol and make fuel streams for consumers that are renewable and lower greenhouse gases and so forth -- and that really was the intent of the renewable fuel standard to start with."

'How do you square the circle here?'

The problem, according to Johnson and other advanced-biofuel producers, is how U.S. EPA has issued what are known as cellulosic waiver credits that allow refiners to forgo actually using physical gallons of fuel to meet the RFS's cellulosic biofuels requirements.

The price of waiver credits is set by EPA. In March, the agency announced that the 2014 price will be 49 cents a gallon, and the 2015 price 64 cents a gallon. To buy a waiver, refiners must also retire a separate advance biofuel credit (*E&ENews PM*, March 25).

When the RFS was established in 2007, there was no commercial production of cellulosic biofuel. So Congress included the waiver credit in order to fill the gap between the actual production of the fuel and EPA's annual mandate for the fuel.

But guessing how much cellulosic biofuel will be produced each year has been a daunting task for EPA, and the agency has historically made available enough waiver credits to cover its entire cellulosic requirement. EPA has also previously provided refunds to refiners for purchases of waivers.

The result is that there's "no incentive to buy the physical fuel that's being produced," Johnson said.

"They [refiners] think that they've got a way to handle their obligation just by doing the waiver credit, so

they have no incentive to buy the physical fuel that's being produced," he said. "The legislation always anticipated that there would be a hand-off from the waiver credits to the physical fuel at the moment in time that the new fuel is being produced."

According to Stock, the cellulosic credit market is further complicated by the fact that cellulosic production is growing quickly because of EPA's recent decision allowing biogas to count for credit. EPA has to walk a fine line, he said, between setting a standard that's not too high or too low.

A federal court in 2013 struck down the agency's cellulosic target because EPA's methodology in calculating the mandate included a "special tilt" in promoting the growth of the industry.

"The challenge is to put those three things together," Stock said. "How do you square the circle here? How do you put all of these pieces together in a way that supports the [cellulosic] producers but that doesn't expose anyone to really high prices and makes everything predictable and orderly?"

Other biofuel companies with U.S. cellulosic operations have also expressed concerns about the liquidity of the credit market.

Christopher Standlee, executive vice president of global affairs for Abengoa Bioenergy, said market issues could affect future production of cellulosic ethanol in the United States.

"We're more concerned about the market overall, an impact on the market that was not what the statute anticipated or was passed to the producers," he said.

Abengoa opened a 25-million-gallon cellulosic ethanol plant in Kansas last October, though it has yet to sell any fuel. Standlee said that the company is doing "preliminary market exploration" while it waits to get a significant amount of fuel produced.

According to Johnson of Quad County, a group of biofuel producers met with EPA in October to raise concerns about navigating the cellulosic credit market. According to a [letter](#) obtained by *Greenwire*, trade organizations representing advanced biofuel producers pressed EPA in December about the issue.

In the letter, the Advanced Ethanol Council and the Biotechnology Industry Organization wrote that refiners had indicated that they would purchase waivers instead of cellulosic credits regardless of whether cellulosic credits are available at a lower cost.

Waivers, they wrote, were meant to be used only when necessary and not as an alternative means of compliance in the renewable fuel standard program as advanced biofuel plants start coming online.

"We are increasingly concerned about the efficiency, liquidity and transparency of the [cellulosic] RIN marketplace going forward," the trade groups wrote. "If not corrected administratively, the current [cellulosic] RIN market dynamic will create unnecessary supply chain risk for the cellulosic biofuel industry and curb the incentive to develop new biofuel capacity."

In a paper posted online last week, Stock laid out what he called a "solution" to the issues with the cellulosic credit market.

He recommended that EPA simply estimate the volume of cellulosic biofuel available in the market at the beginning of the year and then "reset" the mandate at the end of the year when actual production numbers are known.

"That way," he wrote, "all parties know that if a [cellulosic] RIN is generated it will be sold."

Byron Bunker

Director Compliance Division

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To: Argyropoulos, Paul[Argyropoulos.Paul@epa.gov]
From: Kristin.Whitman@shell.com
Sent: Thur 5/7/2015 6:52:39 PM
Subject: RE: Preparation for Next Weeks Meeting
bio John Reese and DV may 5 2015.doc
Matthew Tipper's Bio.docx

Thanks for reaching out about the meeting next week. Here are the bios of the meeting participants, I will be along as well, but I'm the standard issue DC GR person. As for what we would like to discuss, it will be about how to create long term price support and certainty for cellulosic biofuels under the RFS program.

- a. We will like to provide an update on our progress re cellulosic biofuels investments
- b. We would particularly like to discuss, in detail, the reset provision and your agency's plans regarding the resets and how long-term price support and certainty can be achieved through the reset mechanism.

Thank you,
Kristin

Kristin Whitman Senior Advisor, Government Relations | SHELL | 1050 K Street, NW Suite 700 | Washington, DC 20001 |
Tel: 202-466-1485 | **Mobile:** 202-230-6714 | **Internet:** www.shell.us

From: Argyropoulos, Paul [mailto:Argyropoulos.Paul@epa.gov]
Sent: Thursday, May 07, 2015 9:18 AM
To: Whitman, Kristin P SHLOIL-GRA
Subject: Preparation for Next Weeks Meeting

Hello Kristin,

Do you have an agenda and brief Bios you can forward me in advance of your meeting with Chris Grundler and I next week? I'd like to make sure we are prepared as much as possible to address any of your questions or interests. We look forward to meeting with your team.

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

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To: Stewart, Gwen[Stewart.Gwen@epa.gov]
From: Argyropoulos, Paul
Sent: Mon 8/3/2015 6:08:04 PM
Subject: We need an Hour with Chris to finish our RFS -Reset Rule Discussions

Can you put an hour on his calendar for Tuesday or Wednesday next week? Same people for our normal Thursday meetings. How about next Tuesday at 2pm?

Thanks, Paul

Paul Argyropoulos

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To: Machiele, Paul[machiele.paul@epa.gov]; Hengst, Benjamin[Hengst.Benjamin@epa.gov]; Korotney, David[korotney.david@epa.gov]; Charmley, William[charmley.william@epa.gov]; Grundler, Christopher[grundler.christopher@epa.gov]
From: Argyropoulos, Paul
Sent: Tue 7/28/2015 12:50:07 PM
Subject: RE: FYI: Comments on the Annual Rule on the Reset rule from Shell

Yeah, we received them directly as well. Chris saw and commented on them yesterday.....noting the reset comment specifically.

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From: Machiele, Paul
Sent: Tuesday, July 28, 2015 8:41 AM
To: Hengst, Benjamin; Argyropoulos, Paul; Korotney, David; Charmley, William; Grundler, Christopher
Subject: FYI: Comments on the Annual Rule on the Reset rule from Shell

John Reese sent their comments directly to me. I presume API's are similar.

The RFS Reset

Uncertainty in the targets for cellulosic biofuels post 2022 will have an adverse impact on the

ability of project sponsors to raise funding. The upcoming reset of the RFS mandates provides an opportunity to increase certainty to 2022 and beyond. Upon waiving any particular RFS mandate category by 50 percent in any single year or 20 percent in any two consecutive years,

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EPA is required to conduct a rulemaking to adjust the overall schedule of the RFS mandates through 2022. EPA tripped the 50% trigger for the cellulosic category in 2010. Now, if EPA finalizes the volumes as proposed, the 20% trigger will be tripped for both the advanced and general renewable categories. This opens the pathway to reset all of the mandate volumes.

EPA should move forward with this rulemaking expeditiously to provide certainty for investors in cellulosic biofuels by setting the cellulosic volumes through 2022 and beyond at realistically achievable levels, while adjusting the advanced and general renewable categories in such a way that the greenhouse gas emission benefits of the program are maximized while at the same time ensuring that the overall mandates are consistent with the capabilities of infrastructure and vehicles. We look forward to working with the Agency on the reset rulemaking.

To: Dubois, Roland[Dubois.Roland@epa.gov]; Korotney, David[korotney.david@epa.gov]; Machiele, Paul[machiele.paul@epa.gov]; Orlin, David[Orlin.David@epa.gov]; Simon, Karl[Simon.Karl@epa.gov]; Charmley, William[charmley.william@epa.gov]; Hengst, Benjamin[Hengst.Benjamin@epa.gov]; Reid, Lauren[Reid.Lauren@epa.gov]; Lie, Sharyn[Lie.Sharyn@epa.gov]
From: Argyropoulos, Paul
Sent: Mon 7/27/2015 4:34:04 PM
Subject: RE: We need comments on the briefing on the reset rule
Reset Rule Considerations 7-28-15 ver 2 -PA **Ex. 5 - Deliberative**

Some comments and edits through page 14. Not sure I'll add much more.

Paul Argyropoulos

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Web: www.epa.gov

From: Dubois, Roland
Sent: Monday, July 27, 2015 12:04 PM
To: Korotney, David; Machiele, Paul; Argyropoulos, Paul; Orlin, David; Simon, Karl; Charmley, William; Hengst, Benjamin; Reid, Lauren; Lie, Sharyn
Subject: Re: We need comments on the briefing on the reset rule

My comments are attached. Dave O is commenting separately.

From: Korotney, David
Sent: Monday, July 27, 2015 8:32 AM
To: Machiele, Paul; Argyropoulos, Paul; Orlin, David; Dubois, Roland; Simon, Karl; Charmley, William; Hengst, Benjamin; Reid, Lauren; Lie, Sharyn

Subject: We need comments on the briefing on the reset rule

We are briefing Chris tomorrow, so please send your comments around as soon as possible. So far I've seen nothing.

From: Korotney, David

Sent: Wednesday, July 22, 2015 2:46 PM

To: Machiele, Paul; Argyropoulos, Paul; Orlin, David; Dubois, Roland; Simon, Karl; Charmley, William; Hengst, Benjamin; Burkholder, Dallas; Reid, Lauren; Lie, Sharyn

Subject: Second draft of briefing on the reset rule

This version incorporates edits from Lauren and Paul M. I didn't identify deletions, but additions are in blue.

From: Korotney, David

Sent: Monday, July 20, 2015 4:05 PM

To: Machiele, Paul; Argyropoulos, Paul; Orlin, David; Dubois, Roland; Simon, Karl; Charmley, William; Hengst, Benjamin; Burkholder, Dallas; Reid, Lauren; Lie, Sharyn

Subject: Draft briefing on the reset rule

Behold the behemoth. It combines a mess-o-slides provided by Ben with a mess-o-slides provided by Paul M into one big honkin's mess-o-slides. Comments welcome.

To: Grundler, Christopher[grundler.christopher@epa.gov]
From: Argyropoulos, Paul
Sent: Mon 7/20/2015 7:12:09 PM
Subject: RE: 2 Quick RFS items

OK, good.

A couple thoughts and info requested below.

Ex. 5 - Deliberative

Hence, my range. That being said, from start to finish with RFS 2010 rule – We started in January 2008 and implementation happened July 1 2010. The NPRM was issued May 26, 2009 and finalized on March 26, 2010, so less than a year from proposing to finalizing. However, a boat load of work was done well in advance of proposing – more than a years' worth of work.

Ex. 5 - Deliberative

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From: Grundler, Christopher
Sent: Monday, July 20, 2015 1:36 PM
To: Argyropoulos, Paul

Subject: Re: 2 Quick RFS items

I can work with this. Probably a tad more detail than she will be comfortable providing but it is good to give her the option. I will generalize this a bit

One thing we may disagree on -- I don't think we can do the analysis, put out an NPRM and then an FRM in 18 months. Better to give him the timeframe it took us to do the 2010, and point out that was when Congress gave us the #s (implying this could be harder given all the factors Congress set forth in the statute for us to consider in the reset---by the way, what are they?)

So do you remember the time start to finish for RFS2 nprm/FRM?

Christopher Grundler, Director

Office of Transportation and Air Quality

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734-214-4207 (Ann Arbor)

On Jul 20, 2015, at 1:28 PM, Argyropoulos, Paul <Argyropoulos.Paul@epa.gov> wrote:

Let me know if this is along the lines of what you think might work / resonate for a call. I could go further but.....

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Ex. 5 - Deliberative

Ex. 5 - Deliberative

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From: Grundler, Christopher

Sent: Monday, July 20, 2015 12:40 PM

To: Argyropoulos, Paul

Subject: Re: 2 Quick RFS items

Thx. In form of talkers

Christopher Grundler, Director

Office of Transportation and Air Quality

U.S. EPA

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On Jul 20, 2015, at 12:27 PM, Argyropoulos, Paul <Argyropoulos.Paul@epa.gov> wrote:

Will do.

Paul Argyropoulos

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From: Grundler, Christopher
Sent: Monday, July 20, 2015 12:17 PM
To: Argyropoulos, Paul
Subject: Fwd: 2 Quick RFS items

Can u take a whack at this today? Keep it simple. Anything else to share? Maybe public hearing and close if comment period

Christopher Grundler, Director

Office of Transportation and Air Quality

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Begin forwarded message:

From: "McCabe, Janet" <McCabe.Janet@epa.gov>
Date: July 20, 2015 at 12:15:04 PM EDT
To: "Grunder, Christopher" <grunder.christopher@epa.gov>
Subject: RE: 2 Quick RFS items

Thanks Chris.

On #1, it may be hard for Laura to focus on this right now given some other things going on. Our best bet on that is to tee up the points I would make to him so she can see what I'd propose to say. Do you guys want to take a whack at that?

-----Original Message-----

From: Grundler, Christopher
Sent: Monday, July 20, 2015 11:29 AM
To: McCabe, Janet

Subject: 2 Quick RFS items

Hi-two quick notes for today:

1. It's been 30 days since the Lankford hearing. I recommend reaching out to him for a short call, even though the answer on a reset plan has not changed
2. For today's meeting with API/AFPM, we have been publicly saying (I in my opening statement at public hearing) and Gina to corn growers last week, that our proposal has been specifically designed to overcome blendwall. May be worth repeating if they come in, as expected, and say we should set RVOs at 9.7%

Chris

Christopher Grundler, Director
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202-564-1682 (DC)
734-214-4207 (Ann Arbor)

To: Audette, Lucie[audette.lucie@epa.gov]; Benjamin Hengst[Hengst.Benjamin@epa.gov]; Byron Bunker[Bunker.Byron@epa.gov]; Christopher Grundler[Grundler.Christopher@epa.gov]; Dallas Burkholder[Burkholder.Dallas@epa.gov]; David Korotney[Korotney.David@epa.gov]; Iffland, JoNell[Iffland.JoNell@epa.gov]; John Weihrauch[Weihrauch.John@epa.gov]; Karl Simon[Simon.Karl@epa.gov]; Le, Madison[Le.Madison@epa.gov]; Mary Manners[Manners.Mary@epa.gov]; Michael Shelby[Shelby.Michael@epa.gov]; Orlin, David[Orlin.David@epa.gov]; Patricia Shaffer[Shaffer.Patricia@epa.gov]; Paul Machiele[Machiele.Paul@epa.gov]; Robert Larson[Larson.Robert@epa.gov]; Roland Dubois[Dubois.Roland@epa.gov]; Sharyn Lie[Lie.Sharyn@epa.gov]; Vincent Camobreco[Camobreco.Vincent@epa.gov]; William Charmley[Charmley.William@epa.gov]
Cc: OTAQ Materials[OTAQMaterials@epa.gov]
From: Argyropoulos, Paul
Sent: Wed 7/15/2015 7:09:30 PM
Subject: Tomorrows Fuels Meeting
Shifting the Point of the RFS Obligation to Blenders v **Ex. 5 - Deliberative**

Team,

Here's a draft agenda per our call yesterday:

Agenda:

- Briefing on Point of Obligation (Primary briefing for the meeting) - Draft Materials Attached – If any updates, please send along
- Update on Regs Rule Timing – Implications of Delay of Options Selection on Final Rule
- Schedule for Upcoming Briefings
 - Volume Update – Next Tuesday (Includes overview of Import / Export issue from RFA)
 - Reset – The following Tuesday
- Other

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To: Grundler, Christopher[grundler.christopher@epa.gov]; Sutton, Tia[sutton.tia@epa.gov]
Cc: Stewart, Gwen[Stewart.Gwen@epa.gov]
From: Argyropoulos, Paul
Sent: Tue 7/14/2015 11:06:08 AM
Subject: RE: Flight Delay

Will do. Safe Travels and good luck.

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-----Original Message-----

From: Grundler, Christopher
Sent: Tuesday, July 14, 2015 5:37 AM
To: Argyropoulos, Paul; Sutton, Tia
Cc: Stewart, Gwen
Subject: Flight Delay

Paul- my flight is delayed so I will be unlikely to get to EPA before end of RFS brief. You are in charge.
Pls remember to bring up the following:

- 1: EIA angle
- 2: Followup with Sen Lankford (I recall he wanted to hear back from Janet in 30 days on (reset?)(other?).

Tia: have fun at FOIA training !

Christopher Grundler, Director
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734-214-4207 (Ann Arbor)

To: Hengst, Benjamin[Hengst.Benjamin@epa.gov]
From: Argyropoulos, Paul
Sent: Thur 7/9/2015 12:39:02 PM
Subject: Approaches / Options for Reset / 2017 or other Options
Reset Options Chart **Ex. 5 - Deliberative**

Ben,

I quickly pulled this together yesterday. Still working on it but thought I'd share now. I'm also pulling together a few more questions / points to discuss. I haven't touched on really indicating pros and cons but will try to do so some today. I'm up to 6 approaches / options for consideration.

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To: Sutton, Tia[sutton.tia@epa.gov]; Hengst, Benjamin[Hengst.Benjamin@epa.gov]; Machiele, Paul[machiele.paul@epa.gov]
From: Argyropoulos, Paul
Sent: Mon 6/8/2015 5:33:51 PM
Subject: RE: Suggested agenda items for 6/10 RFS hearing prep session

Maybe it is / could be covered under the heading of “Hearing Overview” but if not, you may want to add in some sub-bullets like (committee members, positions or past related statements, related congressional controls, etc.)

Paul Argyropoulos

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US EPA

Office of Transportation and Air Quality

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From: Sutton, Tia
Sent: Monday, June 08, 2015 1:22 PM
To: Hengst, Benjamin; Argyropoulos, Paul; Machiele, Paul
Subject: Suggested agenda items for 6/10 RFS hearing prep session

FYI- below is the list of items that Will Niebling suggests for the agenda for Wednesday.

Ben- your suggestions earlier were: 1) testimony, 2) ozone/anti-backsliding, 3) RIN prices, 4) merchant refiners & recent decision. To meld our 2 lists, I'll throw the following on the table:

- Hearing overview
- Testimony

- Ozone/anti-backsliding
- RIN prices
- Merchant refiners & recent decision
- Reset rule

(Seems like we don't need to discuss CARBIO with her at this first session, but if we talk about ozone, she may question why we aren't discussing Lankford's other issue.)

Let me know if you agree/disagree, and I'll send over to Niebling when I send an update on where we are with materials.

Also, I copied the [redacted] drive folder items to our [redacted] drive [redacted] **Ex. 6 - Personal Privacy**
 [redacted] **Ex. 6 - Personal Privacy** [redacted], and Ben, I moved the hearing testimony file you edited to the "I. Oral Testimony" folder. However, it just dawned on me that Paul M doesn't have access to our [redacted] drive...so if we all have access to the Ann Arbor [redacted] drive, I could move the hearing folder there instead?

PM- you'll be getting invites for the hearing prep meetings shortly. The first one is this Wednesday at 9am.

From: Niebling, William
Sent: Friday, June 05, 2015 6:29 PM
To: Sutton, Tia; Haman, Patricia; Hengst, Benjamin; Lubetsky, Jonathan
Cc: Argyropoulos, Paul
Subject: RE: Janet's letter of invitation

Here's what I would suggest, given that this session is designed to capture a little more of Chris & Ben's availability and to lay the table for the prep sessions the following week (and given that it is interspersed among ozone sessions). I don't know that we will get all the way through it, but

we should try to cover the first three and then the last two can be extra if we need to fill time?

- Hearing overview (Pat or I can do)
- General reactions to NPRM (OTAQ)
- Key messages we would want to get out about it now that we are a week or two removed (OTAQ)
- Lankford issues (reset, ozone)
- Heitkamp issues (CARBIO / biodiesel)

From: Sutton, Tia

Sent: Friday, June 05, 2015 6:22 PM

To: Haman, Patricia; Hengst, Benjamin; Lubetsky, Jonathan; Niebling, William

Cc: Argyropoulos, Paul

Subject: RE: Janet's letter of invitation

Thanks, Pat!

The NPRM prep may still be fresh in Janet's mind, so maybe we start with some of the other issues – esp. the Lankford ones (reset rule & ozone impacts)?

I rearranged & started populating the  drive folder (RFS), so please feel free to add items/move things around more as you see fit.

Ex. 6 - Personal Privacy

From: Haman, Patricia

Sent: Friday, June 05, 2015 5:34 PM

To: Hengst, Benjamin; Sutton, Tia; Lubetsky, Jonathan; Niebling, William

Subject: Janet's letter of invitation

Here you go. Do we have topics for Janet's prep sessions yet? I see the first one is Wednesday morning. Pat

To: Hengst, Benjamin[Hengst.Benjamin@epa.gov]; Machiele, Paul[machiele.paul@epa.gov]; Korotney, David[korotney.david@epa.gov]; Burkholder, Dallas[burkholder.dallas@epa.gov]
Cc: Birgfeld, Erin[Birgfeld.Erin@epa.gov]
From: Argyropoulos, Paul
Sent: Tue 5/26/2015 11:13:58 AM
Subject: RE: A few more items for review (sorry for the barrage)
RFS 3 year rule press QAs 5-26-15 -PA **Ex. 5 - Deliberative**

A few suggested edits / comments on the first document. Second will follow shortly.

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

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Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Hengst, Benjamin
Sent: Monday, May 25, 2015 4:11 PM
To: Machiele, Paul; Argyropoulos, Paul; Korotney, David; Burkholder, Dallas
Cc: Birgfeld, Erin
Subject: A few more items for review (sorry for the barrage)

Hi folks,

I've attached two more items for review. The first is a list of "press-ready" Qs and As. The press office asked us to do these. These would be statements that the press office would send out when appropriate -- they wouldn't have to check with us, which should save some time for all of us.

The second is my attempt at an answer to the question, "Why can't the statutory volumes be met?" If you have more factoids to add here, please do - Chris G. wants some data points on this.

Finally, I've continued to work on the main Q&A set. I've added a few new questions that I need help with, but I won't send those around until some point on Tuesday. I need to reconcile a few different versions of the document first.

thanks,

Ben

To: Grundler, Christopher[grundler.christopher@epa.gov]; Hengst, Benjamin[Hengst.Benjamin@epa.gov]; Cook, Leila[cook.leila@epa.gov]; Machiele, Paul[machiele.paul@epa.gov]
From: Argyropoulos, Paul
Sent: Tue 5/12/2015 2:19:28 PM
Subject: RE: CONFIRMED: Shell Meeting - DC OFFICE

Shell meeting Participants:

- Matthew Tipper, VP of Shell Alternative Energies
- Denise Viola, General Manager for Downstream Policy and Advocacy
- John Reese, Downstream Policy & Advocacy Manager, Americas

Agenda / Discussion Points:

- Long term price support and certainty for cellulosic biofuels under the RFS program
- Provide an update on Shell's progress regarding cellulosic biofuels investments
- Reset provision and how long-term price support and certainty can be achieved through reset mechanism

Bios

John E. Reese is Downstream Policy & Advocacy Manager, Americas with Shell Oil Products US. In that role, he manages Shell's participation in US and Canadian regulatory issues that affect Shell's downstream business, including fuels regulatory initiatives at the national and local levels. Prior to joining Shell in 2002, Mr. Reese spent ten years as an attorney with the American Petroleum Institute (API) in Washington, DC, where he concentrated on fuels issues. While at API, Mr. Reese participated in legislative activities, rulemakings, and litigation concerning reformulated gasoline, low sulfur gasoline and diesel, mobile source air toxics, oxygenates, and numerous state fuels issues. Mr. Reese has a law degree from Catholic University, a Master of Arts degree from the College of William and Mary, and a Bachelor of Science degree from George Mason University. Mr. Reese resides in Houston, Texas.

Denise M. Viola is General Manager (GM) for Downstream Policy and Advocacy. In this role, Denise leads a team responsible for developing the policy position and advocacy implementation plans to support Shell's Downstream business goals. This work is coordinated across the Shell Group, with other Policy and Advocacy teams. Prior to this role, Denise was GM of Downstream's Soil and Groundwater Risk Management team and Business Planning and Performance Manager at the Shell, Martinez Refinery. Before joining Shell, Ms. Viola had a 20+ year career with Engelhard Corporation, spanning roles in technical services for refining catalysts, through product management, marketing positions, sales management positions within the Environmental Catalyst group and finally a global business general management position. Ms. Viola has a Bachelor of Science degree in Chemistry from the University of Delaware and an MBA from Drexel University.

Matthew Tipper was appointed VP of Shell Alternative Energies in 2012 where he has responsibility for developing Advanced biofuels, Hydrogen and electric mobility, marketing of Shell GTL Fuels, and supporting Shell's sugar and cane ethanol joint venture in Brazil. He joined Shell Alternative Energies in 2009 and has over 25 years' commercial experience in Shell, gained across various Downstream business roles, primarily in trading and supply. He was previously responsible for leading Shell's global Gasoline trading business, where he

spent several years working in Houston and established a number of new trading ventures. He spent much of his early career in a range of trading and supply operations in Africa, the Middle East, Asia and the UK.

Matthew has a first degree in Geography and an MBA. He is a fellow of the Royal Geographical Society, and a graduate of Mansfield College Oxford. He is married with two daughters. His hobbies include mountaineering, travel and walking his dog

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-----Original Appointment-----

From: Grundler, Christopher
Sent: Wednesday, March 25, 2015 9:21 AM
To: Grundler, Christopher; Hengst, Benjamin; Cook, Leila; Argyropoulos, Paul; Machiele, Paul
Subject: CONFIRMED: Shell Meeting - DC OFFICE
When: Tuesday, May 12, 2015 2:00 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: RM. 6520 DC/RM. C-174 DOD AA

MEETING PARTICIPANTS:

I received a note from Paul and shared an agenda last week.
The participants will be:

Matthew Tipper, VP Alternative energies
Denise Viola, GM Downstream Policy and Advocacy
John Reese, Manager, North America Policy and Advocacy
Kristin Whitman, Senior Advisor, Government Relations

MEETING REQUEST:

From: Kristin.Whitman@shell.com [<mailto:Kristin.Whitman@shell.com>]
Sent: Tuesday, March 10, 2015 4:53 PM
To: Stewart, Gwen
Subject: Meeting request - Shell

Gwen,

I would like to schedule a meeting with Director Grundler for several members of the Shell Alternative Energies team that will be in town in April. We have flexibility on the week that the meeting occurs, but would like to see if there is availability the week of April 13 or 20. The participants will be Matthew Tipper, VP Alternative Energies; Andrew Murfin, GM Advanced Biofuels; Denise Viola, GM Downstream Policy and Advocacy.

Thank you for your input to help with planning our trip.

Kristin

Kristin Whitman Senior Advisor, Government Relations | SHELL | 1050 K Street, NW Suite 700 | Washington, DC 20001 | Tel: 202-466-1485 | Mobile: 202-230-6714 | Internet: www.shell.us

To: Shaffer, Patricia[Shaffer.Patricia@epa.gov]; Audette, Lucie[audette.lucie@epa.gov]; Benjamin Hengst[Hengst.Benjamin@epa.gov]; Byron Bunker[Bunker.Byron@epa.gov]; Christopher Grundler[Grundler.Christopher@epa.gov]; Dallas Burkholder[Burkholder.Dallas@epa.gov]; David Korotney[Korotney.David@epa.gov]; Horowitz, Michael[horowitz.michael@epa.gov]; Iffland, JoNell[Iffland.JoNell@epa.gov]; John Weihrauch[Weihrauch.John@epa.gov]; Karl Simon[Simon.Karl@epa.gov]; Ketcham-Colwill, Nancy[Ketcham-Colwill.Nancy@epa.gov]; Le, Madison[Le.Madison@epa.gov]; Mary Manners[Manners.Mary@epa.gov]; Michael Shelby[Shelby.Michael@epa.gov]; Patricia Shaffer[Shaffer.Patricia@epa.gov]; Paul Machiele[Machiele.Paul@epa.gov]; Robert Larson[Larson.Robert@epa.gov]; Roland Dubois[Dubois.Roland@epa.gov]; Sharyn Lie[Lie.Sharyn@epa.gov]; Vincent Camobreco[Camobreco.Vincent@epa.gov]; William Charmley[Charmley.William@epa.gov]

From: Argyropoulos, Paul

Sent: Thur 4/2/2015 12:46:49 PM

Subject: FW: Agenda and Current Materials for Tomorrow 10am Fuels Meeting

[Reset rule triggers 4-2-15](#)

[Janet briefing for USDA ve](#)

Ex. 5 - Deliberative

Some updated materials for the 10.

Pat, there is one other file (Cost) that hasn't changed so please print that one from yesterday as well.

Thanks, Paul

Paul Argyropoulos

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From: Korotney, David
Sent: Thursday, April 02, 2015 8:25 AM
To: Argyropoulos, Paul
Subject: RE: Agenda and Current Materials for Tomorrow 10am Fuels Meeting

Revised slides on the reset rule and the materials for Janet to review with USDA.

Not sure we are going over these with Chris today, but here they are anyway.

From: Argyropoulos, Paul
Sent: Wednesday, April 01, 2015 3:31 PM
To: Audette, Lucie; Hengst, Benjamin; Bunker, Byron; Grundler, Christopher; Burkholder, Dallas; Korotney, David; Horowitz, Michael; Iffland, JoNell; Weihrauch, John; Simon, Karl; Ketcham-Colwill, Nancy; Le, Madison; Manners, Mary; Shelby, Michael; Shaffer, Patricia; Machiele, Paul; Larson, Robert; Dubois, Roland; Lie, Sharyn; Camobreco, Vincent; Charmley, William
Cc: OTAQ Materials
Subject: RE: Agenda and Current Materials for Tomorrow 10am Fuels Meeting

Updated cost slides for tomorrow.

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From: Argyropoulos, Paul

Sent: Wednesday, April 01, 2015 3:30 PM

To: Audette, Lucie; Benjamin Hengst; Byron Bunker; Christopher Grundler; Dallas Burkholder; David Korotney; Horowitz, Michael; Iffland, JoNell; John Weihrauch; Karl Simon; Ketcham-Colwill, Nancy; Le, Madison; Mary Manners; Michael Shelby; Patricia Shaffer; Paul Machiele; Robert Larson; Roland Dubois; Sharyn Lie; Vincent Camobreco; William Charmley

Cc: OTAQ Materials

Subject: Agenda and Current Materials for Tomorrow 10am Fuels Meeting

Team –Agenda / Subjects for the Fuels Meeting with Chris Tomorrow

Pat – Please wait to print any materials until 9am tomorrow – just in case we have any updated materials or additional materials sent in. Thanks.

- RFS Advanced and Total Costs Briefing (Attached current revised slide deck -- will be sent an update tomorrow morning if there are any other changes)

- Read Out from Today's Meeting with Janet

- o Revised slide deck being prepared

- o Reset Rule slides attached for discussion purposes

- Discussion – NBB Petition and Lawsuit

Ex. 5 - Deliberative

Ex. 5 - Deliberative

- Other

Thanks, Paul

Paul Argyropoulos

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From: Argyropoulos, Paul

Sent: Wednesday, April 01, 2015 10:46 AM

To: Audette, Lucie; Benjamin Hengst; Byron Bunker; Christopher Grundler; Dallas Burkholder; David Korotney; Horowitz, Michael; Iffland, JoNell; John Weihrauch; Karl Simon; Ketcham-Colwill, Nancy; Le, Madison; Mary Manners; Michael Shelby; Patricia Shaffer; Paul Machiele; Robert Larson; Roland Dubois; Sharyn Lie; Vincent Camobreco; William Charmley

Subject: Draft Agenda for Tomorrow 10am Fuels Meeting

Team – Draft Agenda / Subjects for the Fuels Meeting with Chris Tomorrow

- RFS Advanced and Total Costs Briefing (Final will be sent around later today)
- Read Out from Today's Meeting with Janet
- Discussion – NBB Petition and Lawsuit Ex. 5 - Deliberative

Ex. 5 - Deliberative

- Other

Anything else?

Paul

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To: Grundler, Christopher[grundler.christopher@epa.gov]; Hengst, Benjamin[Hengst.Benjamin@epa.gov]
From: Argyropoulos, Paul
Sent: Wed 3/11/2015 9:35:19 AM
Subject: Fwd:
[ABLC oral Speech version March 2015 for WSJ.docx](#)
[ATT00001.htm](#)

FYI. He may have a few modifications.

Paul Argyropoulos
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Begin forwarded message:

From: <Michael.McAdams@hklaw.com>
Date: March 10, 2015 at 6:47:53 PM EDT
To: <Argyropoulos.Paul@epamail.epa.gov>

Paul: Here is my speech. Wall Street Journal is covering and it will be online tomorrow.
Best to the team.

Michael J. McAdams | Holland & Knight

President, ABFA
Senior Policy Advisor
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michael.mcadams@hklaw.com | www.hklaw.com

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